

**IN THE UNITED STATES DISTRICT COURT FOR THE  
SOUTHERN DISTRICT OF TEXAS  
HOUSTON DIVISION**

United States Courts  
Southern District of Texas  
FILED

**03/02/2024**

Nathan Ochsner, Clerk of Court

Aderonke Aderemi

Jeff Olley

J.O

*Plaintiffs*

**Civil Action No**

4:24-cv-848

Original Complaint

Attached Request for Ex Parte  
Temporary Restraining Order

**Vs**

PAC Vineyards LLC

Massandra KV Vineyards Owner LLC

Knightvest LLC

and Andrews Myers P.C

*Defendants*

Jury Demand

**Plaintiffs' Original Complaint**

**Come Now** Plaintiffs Aderonke Aderemi, Jeff Olley *pro se* and their Minor daughter J.O files their Original Complaint and brings this action to enforce Title VIII Civil Rights Act of 1968, as amended by the Fair Housing Amendment Act of 1988, 42 U.S.C. § 3601, et seq, [ 42 U.S.C. § 1982]. (The "Fair Housing "Act"). This action is brought under 42 U.S.C. § 3613 against

Defendants' PAC Vineyards LLC, Massandra KV Vineyards Owner LLC, Knightvest LLC and Andrews Myers PC and an attached request for a Temporary Restraining Order against two of the defendants (Massandra KV Vineyards LLC and Knightvest LLC Pursuant to 42 USC 3613(c) and would respectfully show the Court the following:

### **Jurisdiction**

- 1 This Court has Jurisdiction under Title 28 U.S.C 1331, and 42 USC §3613, 28 USC §1357 and Supplemental State Law 42 USC 1367(b)

### **Venue**

- 2 Under Title 28 U.S.C Code 1391 the venue is proper because the violations occurred in Harris County Texas within the United States Southern District of Texas

### **PARTIES AND THE SUBJECT PROPERTY**

- 3 Plaintiffs Aderonke Aderemi is a resident of Harris County, Texas and the subject Property is located at 21550 Provincial Blvd Katy Texas 77450
- 4 Plaintiff Jeff Olley is the husband of Aderonke Aderemi and a Resident of Harris County, Texas

- 5 Plaintiff J. O is the Minor daughter of the Plaintiffs who also is a Resident of Harris County, Texas
- 6 Defendant PAC Vineyards LLC former owner of the Vineyards Apartment and has Apartment businesses within Texas and can be served with process by serving their registered agent at Vcorp Services, LLC 1999 Bryan St, Suit 900 Dallas Texas 75201-3136 USA
- 7 Massandra KV Vineyards Owner Vineyards LLC has Real Estate businesses within the Harris County, Texas and can be served with process by serving their registered agent at Knightvest LLC 5728 LBJ Freeway Suite 400 Dallas 75240.
- 8 Andrews Myers PC has its law firm within Harris County, Texas and can be served with process by serving their registered agent Willams Davidson 1885 Saint James Place 15<sup>th</sup> Floor Houston Texas 77056 USA
- 9 Knightvest LLC is the managing company of the Vineyards Apartment on behalf for Massandra KV Vineyards Owner LLC and can be served with process by serving their registered agent David Moore 5728 LBJ Freeway suite 400 Dallas Texas 75240 USA

### **Disclosure and Discovery**

Plaintiffs would conduct Disclosure and Discovery Plan under the Federal Rules of Civil Procedure.

### **Facts**

- 1 At the times relevant to the Plaintiffs, Plaintiffs and their Minor Child are currently residents of the apartment located at 21550 Provincial Blvd Katy Texas 77450 (the "Subject Apartment")
- 2 Plaintiffs and family have been brutally harmed by housing discrimination based on Race, Defendants Massandra KV Vineyards Owner LLC as alleged successor in interest to "PAC" and PAC Vineyards LLC committed prohibited housing practices under The Fair Housing Act, 42 USC 3601- 3619. which began in 2021 and currently continues
- 3 A residential lease Contract Agreement was entered between Plaintiffs and PAC Vineyards LLC former Owner of the Vineyards Apartment located at 21550 Provincial Blvd Katy 77450. PAC Vineyards LLC own multi-family Apartments business in Texas and all over the United States
- 4 Plaintiffs exercised their right granted by law in reporting Management employee for misconduct and other Apt Policy issues that was being

violated. Plaintiffs made several complaints to defendant PAC between the Months of Feb 28<sup>th</sup> 2021 through April 7<sup>th</sup> 2021 AND within 3 weeks of Plaintiffs' complaint to PAC, Plaintiffs were immediately retaliated against with alleged lease violations, on or around April 29<sup>th</sup> 2021

- 5 **On May 4<sup>th</sup> 2021 a Notice was sent by defendant PAC employee, signed by Kimberley Hodge (Chief Property Management Officer) intimidating and coercing Plaintiffs Jeff Olley and Aderonke Aderemi and their minor daughter to terminate our lease agreement within 10days and to relief Defendant PAC from future claims forcing Plaintiffs to cancel their renewal lease agreement within 5 days. The letter was addressed to Mr Aderemi and Mrs Olley and our daughter without any given reasonable reason to terminate our lease. Letter stated that termination of the lease contract agreement was within 10 days of an identified cancellation date, and within 5 days to cancel the lease agreement and release them from all future claims. Plaintiffs exercised its right granted**

by Fair Housing Act. Plaintiffs refused to terminate it's right to the lease contract within 10days from the letter dated May 4<sup>th</sup> 2021

- 6 On May 18<sup>th</sup> 2021 Plaintiffs received another alleged lease violation
- 7 On June 1<sup>st</sup> 2021 Plaintiffs timely rent payment was rejected Plaintiff was immediately denied access to it's Online Portal Apartment Account **which was deactivated without notice**. Plaintiffs were locked out of it's online portal account and couldn't get any community information, or put in a maintenance request or make any online rent payment.
- 8 On June 1<sup>st</sup> 2021 Management sent Plaintiffs a 3 day notice to vacate the Premises located at 21550 Provincial Blvd, Katy Texas 77450
- 9 On June 10<sup>th</sup> 2022 PAC immediately filed an Eviction lawsuit for alleged conduct against Plaintiffs based on Race.
- 10 Massandra KV and Knighvest LLC allegedly took over the property on July 19<sup>th</sup> 2021 and Amended the First Eviction Lawsuit on or around August 16<sup>th</sup> 2021

- 11 On Aug 17<sup>th</sup> 2021 Plaintiffs filed a Housing discrimination complaint based on race to HUD and didn't get a response until almost 2 years on February 1<sup>st</sup> 2023. During the wait time my housing discrimination grew worse and became intimidating and oppressive beyond comprehension. Defendants interfered with Plaintiffs' renting by threats, intimidation, harassment, and coercion.
- 12 On September 6th, 2023, Plaintiffs Housing Complaint was fraudulently covered up and unlawfully closed without a lawful investigation. Defendants Massandra KV and Knightvest LLC purposefully interfered and in connivance with TWC Investigator (Myron J. Lewis) covered up the prohibited housing practices committed by Massandra Kv Vineyards and Knightvest LLC that had occurred and was continuous and currently is
- 13 On or around April 2022 Defendant Massandra Kv and Knightvest LLC during the pendency of the first eviction lawsuit filed against Plaintiff and during the waiting period to get a response to Plaintiffs' discriminatory housing complaint to HUD defendants intentionally rendered the legal appeal process ineffective by it's continuous constructive eviction actions by intentionally rendering Plaintiffs' Apartment Unit uninhabitable,
  - a. Plaintiffs Apartment Unit was without a working AC for over one year and currently,
  - b. Plaintiffs Apt Unit was without Heating System for over a year including the cold weather and the summer months and currently not working ,
  - c. Mold in Plaintiffs' Apt Unit over a year and continues which has materially caused damages to the health and safety of Plaintiffs.
  - d. Leaking roof and sink over a year and currently,



- e. No working Fridge for over a year,
- f. leaking and defective Boiler System leaking in Plaintiffs' apartment for over a year. which deprived Plaintiffs right granted to peace and quiet enjoyment of the Premises
- g. non-properly working cooking stove for over a year.
- h. Remote Access Key to the Premises was intentionally deactivated by defendant for over a year.
- i. Defendant intentionally allowed a hostile environment including harassment by defendants' employees and threat by other residents. defendants deliberately ignored several complaints made by Plaintiffs of harassment by other Residents
- j. Racial slur and racial profiling by defendants and defamation of Plaintiffs' character
- k. Plaintiffs were assaulted by defendant's Employee (Apt Manager Luis Cortez) on April 11<sup>th</sup> 2022, Defendants Apartment Manager was cited by The Police for assault and entered a plea deal on July 6<sup>th</sup> 2023 in the Justice of the Peace Court in Texas,
- l. Massandra KV intentionally turned off Plaintiffs private electricity for about 5 days and refused to respond to Plaintiffs emergency request after it had turned off Plaintiffs' electricity intentionally.
- m. Defendants intentionally and willfully breached the implied warranty habitability by rendering Plaintiffs place of dwelling uninhabitable, denying Plaintiffs services, amenities, facilities, refusal to respond to emergency



maintenance request. Plaintiffs were treated in different terms and conditions of the lease and under the Fair Housing Act because of Plaintiffs' Race

2 Defendants Massandra KV, Knightvest LLC engaged in improper use of the legal process with ulterior motives to evict Plaintiffs and caused irreparable harm and damages.

a. On April 5<sup>th</sup> 2022 defendants interfered and abused the due process of law by requesting for an immediate Writ of Possession within two days after signed judgment, Plaintiffs immediately posted a bond next day April 6<sup>th</sup> 2022 to suspend the April 5<sup>th</sup> 2022 judgment to evict Plaintiffs. Defendant Massandra KV Vineyards. continued it's unlawful misconduct by requesting for an immediate Writ of Possession on June 9<sup>th</sup> 2022, and July 12<sup>th</sup> 2022 and the unlawful Writ of Possession was unlawfully granted on July 15<sup>th</sup> 2022. The First Court of Appeals **signed an Order TO STAY** the immediate Writ of Possession **on July 15<sup>th</sup> 2022, Defendant continued to unlawfully pursue an illegal and an immediate Writ of Possession in connivance with Andrews Myers PC against Plaintiffs on July 18<sup>th</sup> 2022. On July 20<sup>th</sup> 2022 the Appeals Court restated its order signed on July 15<sup>th</sup> 2022 that it's Order must be OBEYED AND EXECUTED. Defendant continued to breach the law and proceeded to constructively evict Plaintiffs by intimidation, force and interference with Plaintiffs' renting**

b. Despite the Stay Order defendant without regards to the law continued to request for an immediate writ of possession on July 18<sup>th</sup> 2022 by unlawfully conniving

with Andrews Myers PC and Harris County Court Clerk to request and file the Writ of Possession without the mandatory e-filing method to evict Plaintiffs. The First Court of Appeals had to immediately RESTATE its Order signed on July 20th 2022. Defendant disregarded this Order and continued to constructively evict Plaintiffs. **A Writ of Possession request by Masssandra KV Vineyards in connivance with Andrews Myers PC law firm who was not in the Court Record representing any party in the First eviction lawsuit** Pursuant to 42 USC §3603 It shall be unlawful to coerce, intimidate, threaten or interfere with any person in the exercise or enjoyment of any right granted or protected by law

a. **On October 31st 2023 The Court of Appeals First District of Texas entered it's judgment in Favor of Plaintiffs on the First Eviction Suit for alleged conduct filed against Plaintiffs on June 10<sup>th</sup> 2021 giving Plaintiffs the Superior Right to Possession of the apartment and ordered that Defendant Massandra KV pay all Appellate Court Cost..**

b. **On January 19th 2024 the Honorable First Court of Appeals Issued its Mandate and certified it by the seal of The Court of Appeals, First District of the State Of Texas and further Commanded it's observance, be obeyed and executed. This lawful Order was not observed by the defendant who began a second eviction lawsuit on December 4<sup>th</sup> 2023 and on January 17<sup>th</sup> 2024 defendant filed a forcible detainer and requested back rent of \$0.00 in the Justice of the Peace Court Precinct 5 Place**

**2 without regard to the Mandate of The First Court of Appeals and its Oct 31st 2023<sup>t</sup> judgment. Defendant are in direct violation of the Title 42 USC 42 3603 and supplemental state Law Texas Property Code 24 and 92**

- c. On December 4th 2023 defendant Massandra KV Vineyards LLC without regards to the Appellate Court Judgment began an intimidation Eviction Suit against Plaintiffs. Massandra KV Vineyards Apartment Manager came to Plaintiffs' Apartment harassing Plaintiffs requesting that Plaintiffs vacate the Apartment Unit (Evidence on Camera). **See Exhibit 3 Screenshot of Massandra Manager in front of Plaintiff's Apt Unit Door.** Defendant Massandra KV Vineyards LLC continues to violate Plaintiffs right in attempting to exercise housing rights granted by law and The Fair Housing Act
- d. **Defendant refused to address several complaints made about some residents and non-resident harassment and threats including defendant's employee**
- a. Defendants Massandra KV Vineyards LLC purposefully created a hostile environment for Plaintiffs by its intentional failure to address Plaintiffs' several complaints of other residents and its employee in the Community that were harassing, threatening and causing disturbance to Plaintiffs use of the Premises. Defendants. Massandra KV Vineyards and PAC Vineyards LLC continued to interfere with Plaintiffs renting.

**Count I CAUSE OF ACTION**

Plaintiffs exercised its rights granted by law, protected by the Fair Housing Act, its lease and the adverse actions by Defendants Massandra KV Vineyards LLC, Knightvest LLC and PAC Vineyards LLC was retaliation, intimidation, interference and coercion based on Race in direct violation under Title 42 USC 3617

On June 10th 2021 the First Eviction Lawsuit for alleged conduct against Plaintiffs was based on race. The Original Petition was filed by PAC Vineyards LLC former owner of the Vineyards Apartment located in Katy Texas and the Original Petition for the eviction was continued and amended by defendant Massandra KV Vineyards LLC, allegedly as successor in interest to PAC Vineyards LLC who continued the lawsuit by intimidation, threats, severe abuse of the eviction process, improper use of the legal system in attempting to evict Plaintiffs, discriminatory, criminal misconduct, discriminatory actions, fraud, frivolous and unlawful Court filings, conspiracy with the Harris County Court Clerk, Andrews Myers PC to unlawfully submit illegal writ of possession documents to the Court to evict Plaintiffs despite Appeal Bond that was posted by Plaintiff to suspend the April 5<sup>th</sup> 2022 Trial Court Judgment and the Appellate Court Stay Order on the Illegal Writ of Possession signed on July 15<sup>th</sup> 2022 and July 20<sup>th</sup> 2022 Furthermore defendant intentionally, maliciously conspired with the

defendant Andrews Myers PC attorneys at law to request a Writ of Possession via an illegal entry into the Harris County Court System to cause to harm and irreparable damages, Andrews Myers were never entered into the Court Record representing any of the parties in the 1<sup>st</sup> eviction lawsuit by PAC Vineyards and amended by Massandra KV. Plaintiffs exercised their right during the eviction process granted by Law to enjoy the use of the Premises pending the resolution of the eviction. Under Title 42 USC §3617, 42 USC §3603, §3606, §3604 §3605.

## **Count II**

**Defendants constructively evicted Plaintiffs and abused Plaintiffs due process rights granted by law and the First Court of Appeals ORDER SIGNED ON JULY 15<sup>TH</sup> 2022 and RESTATED ON JULY 20<sup>TH</sup> 2022 which granted Plaintiffs an injunctive relief but was voided as a result of defendants intimidation and interference 42 USC 3617, 3604**

Plaintiffs were denied access to the Community amenities, facilities. unlawfully restrained Plaintiffs' from the leasing office area and threatened with criminal trespass if found around the leasing office area including the mail room without judicial order and in violation of the lease which states that except for Judicial Order only can access be denied, Plaintiffs 'were and are currently denied emergency maintenance services, and defendants deliberately rendered Plaintiffs apartment uninhabitable. Actions are in violation of the Title 42 USC 3607 During the pendency of the First Eviction Lawsuit filed

On April 11th 2022 Plaintiffs were assaulted by defendant's Apartment Manager Luis Cortez who was cited for assault and charged by the State of Texas., Case Num 225200129365 at the Justice of the Peace Court Precinct 5 Place 2

- 1 Defendants action caused substantial economic hardship. 42 USC 3601-3619
- 2 **Count 5**  
Interference and abuse of due process rights 42 USC 3601-3619
- 3 **Count 6**  
Improper and unlawful use of the legal process with ulterior motives sec 804 42 USC 3601-3619
- 4 **Count 7**  
Discriminatory Breach of contract signed by defendant 42 USC 3601-3619 defendant filed eviction lawsuit for conduct against Plaintiffs on alleged lease violation.
- 5 **Count 8**  
Intimidation tort and participatory conspiracy 42 USC 3601-3619  
Defendant Andrews Myers and Massandra KV conspired to injure, oppress, threaten, or intimidate Plaintiffs in the free exercise or enjoyment of any right or privilege secured to Plaintiffs by the Constitution or laws of the United States,
- 6 Count 9  
Defamation of character by the defendant against Plaintiffs 42 USC 3601-3619
- 7 Count 10  
Malicious intent to cause harm 42 USC 3601-3619
- 8 **Count 11**  
**Civil conspiracy intentional infliction of psychological and emotional distress between Massandra KV and Andrews Myers. Unlawful action** Garratt v. Dailey, 46 Wash.2d 197 (1955)

9 **Count 10**

Racial discrimination against Plaintiffs by defendant 42 USC 3601-3619  
Defendants action are willfully, intentional and malicious

**Conclusion**

Defendants Massandra KV Vineyards Owner LLC, Knightvest LLC, PAC Vineyards LLC  
and Andrews Myers PC unlawfully discriminatory actions are based on Race against Plaintiffs  
Aderonke Aderemi, Jeff Olley and their Minor child is Intentional, Purposeful, Willfully.

**REQUEST FOR RELIEF**

Defendants' Massandra KV, PAC Vineyards LLC, Knightvest LLC and  
Andrews Myers deprived Aderonke Aderemi, Jeff Olley and their Minor child J.O  
of their constitutional rights, were subjected to agonizing emotional pain, fear,  
severe and ongoing emotional injuries. Damage, anxiety, pain and suffering,  
substantial economic harm

Plaintiffs now asks the Court to enter a judgment confirming that  
Defendants are not above the laws Declare that Defendants' conduct violated the  
Fair Housing Act of 1968, and 42 USC 3603 -3619

Enjoin Defendants, their subsidiaries, agents, employees, and successors,  
and all other entities in active concert or participation with Defendants, from:  
enforcing constructive eviction and discriminatory eviction filed on Jan 17<sup>th</sup> 2024



Plaintiffs now asks the Court to enter a judgment confirming that Defendants are not above the laws Declare that Defendants' conduct violated the Fair Housing Act of 1968, and 42 USC 3603 -3619

Enjoin Defendants, their subsidiaries, agents, employees, and successors, and all other entities in active concert or participation with Defendants, from: enforcing constructive eviction and discriminatory eviction filed on Jan 17<sup>th</sup> 2024

Award Plaintiffs Compensatory damage, Punitive damages, exemplary damage, actual damages totally 67million dollars including post judgments interest if applicable attorney fees and other equitable reflef

**WHEREFORE**, on the basis of the foregoing, Plaintiffs demands a jury trial for all issues so triable pursuant to the Seventh Amendment of the United States Constitution and Federal Rules of Civil Procedure, and requests that this Court issue the following relief:

**Respectfully submitted**

  
Aderonke Aderemi

**Jeff Olley**



**P.O.BOX 5044**

**KATY TEXAS 77491**

02/28/2024